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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

PETER LORA, et al

1:07 CV 2787

JUDGE DAN AARON POLSTER

V.

DEAN BOLAND

NOTICE OF DEPOSITION
DUCES TECUM

Now comes Dean Boland and gives notice that he will be taking the following deposition:

1. Witness, Peter Lora.

Place: Offices of Dean Boland

18123 Sloane Avenue Lakewood, Ohio 44107 216-529-9371 phone

Date: Friday, March 6, 2009

Time: 9:00 A.M.

DUCES TECUM: Plaintiff Lora is commanded to bring with him and produce for inspection the following:

- 1. All documents related to any claim on behalf of Lora or his minor ward whom is a plaintiff in this matter as to reputation damage resulting from defendant's alleged conduct.
- 2. All documents related to any claim on behalf of Lora or his minor ward whom is a plaintiff in this matter as to financial damage resulting from defendant's alleged conduct.
- 3. All documents related to any claim on behalf of Lora or his minor ward whom is a plaintiff in this matter as to psychological damage resulting from defendant's alleged conduct.
- 4. All documents related to any claim on behalf of Lora or his minor ward whom is a plaintiff in this matter as to physical damage resulting from defendant's alleged conduct.

Since Plaintiff is a party to this action, no subpoena will be issued. This

deposition is taken pursuant to Rule 30 of the Federal Rules of Civil Procedure, and will be continued from day to day until completed and may be used as evidence in the trial of this matter.

Respectfully submitted,

/s/ Dean Boland Dean Boland, Esq. 18123 Sloane Avenue Lakewood, Ohio 44017 dean@deanboland.com

Proof of Service

A true and accurate copy this Notice of Deposition has been electronically served this 28th day of January, 2009 on all parties as a function of the electronic filing system:

/s/ Dean Boland
DEAN BOLAND
Supreme Court Reg. No. 0065693